

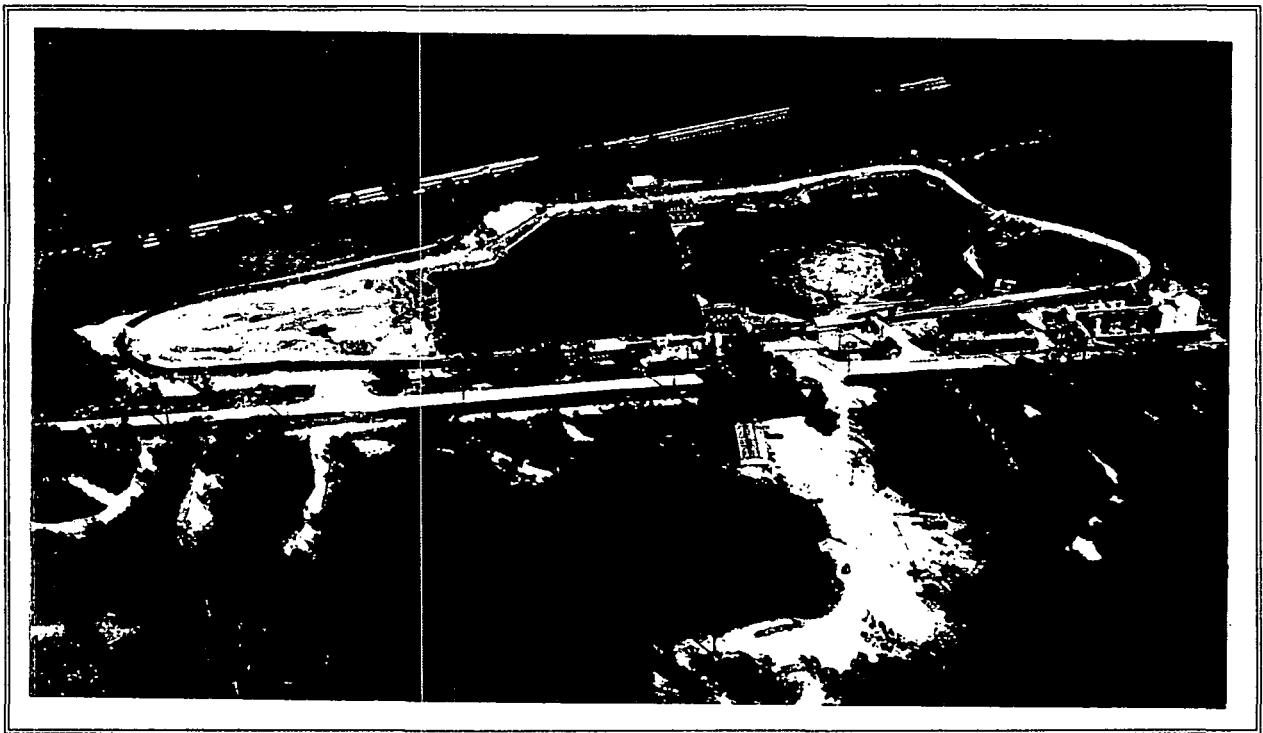


# **French Ltd. Project**

**FLTG, Inc.**

**Crosby, Texas**

## **MONTHLY PROGRESS REPORT**



**Submitted to:**

**U.S. Environmental Protection Agency - Region 6  
and  
Texas Natural Resource Conservation Commission**

**April, 1996**

975829





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## 1.0 INTRODUCTION

This report covers the activities of FLTG, Inc. and the French Limited Project for April, 1996. FLTG, Inc. manages the project for the French Limited Task Group of Potentially Responsible Parties.

During April, 1996, the project team focused on the following activities and issues:

- Health, Safety, and Quality.
- Safety awareness.
- Safety on dismantling/salvage jobs.
- HAZOP of daily work assignments.
- Detecting and correcting work place hazards.
- Site closure activities.
- Backfill Cell D.
- Operation of the data base management system.
- Dismantling and salvage of shut-down systems.
- Wetlands project maintenance.
  - This report includes:
    - A summary of April activities, issues, and progress.
    - Lagoon activities.

- Groundwater and Subsoil Remediation activities, issues, and progress.
- Site closure and dismantling activities.
- Groundwater Treatment Plant activities and issues.
- Ambient Air Management.
- QA/QC status and data.
- Site management activities and issues.
- Wetlands maintenance.

## 2.0 SUMMARY

### 2.1 Summary of Activities and Progress

#### 2.1.1 Health and Safety

Emphasized the safety issues associated with multiple job assignments, limited support personnel, and dismantling systems; emphasized the need to be flexible and responsive to personal limitations and to changing job conditions; reviewed potential distractions and the impact on safety awareness.

No personal injury or equipment damage incidents.

All site workers earned the April safety bonus.

Conducted safety meetings and job inspections at the start of each shift; reviewed safety issues before starting all jobs.

All employees and contractors attended daily safety meetings.

Conducted daily mini-HAZOP of all specific jobs.

Reviewed the specific hazards and issues associated with dismantling and site closure work.

Supervision made 86 specific on-the-job safety contacts.

Emphasized the hazards and precautions associated with working around moving equipment.

Logged all safety issues each shift; less than 24-hour response to all safety issues.

The daily raffle ticket safety awareness program has been effective in maintaining daily safety awareness among all site personnel and contractors.



### **2.1.2 Quality/QAQC/Data Base Management**

The total quality process was used. The status of the goals is shown on Table 2-1.

All quality goals were met.

Raw data is being validated as per the plan.

The data base management system operated with no problems or delays.

There were no data or reports rejected due to errors.

### **2.1.3 Lagoon**

It was not necessary to dewater Cell D.

Started to backfill Cell D.

Set up to stabilize the biomass in Cell D.

Continued lagoon area grading.

### **2.1.4 Ambient Air Management**

Ambient air quality was manually checked daily with portable TVOC analyzers, and no response action was required.

Air quality was continuously monitored in all potential exposure areas and on all special jobs.

### **2.1.5 Aquifer Remediation**

Collected the second quarter 1996 progress samples.

Developed work plan to replace INT-130.

#### **2.1.6 Water Treatment**

No water treatment was required.

Removed the carbon from the carbon filters.

Developed scope of work for dismantling.

#### **2.1.7 Site Closure and Dismantling**

Started final site grading.

Collected/stored all surplus equipment in the south lot.

#### **2.1.8 Wetlands Restoration**

Inspected site twice per week to evaluate vegetation growth and maintenance requirements.

Completed the 2nd quarter site status inspection; vegetation growth was good; no maintenance was required.

#### **2.1.9 Site Management and Issues**

Reviewed site progress and issues in detail with EPA and TNRCC on a regular basis.

Validated all analytical data as per the QAQC plan.

Reviewed project status and issues each day to ensure focus on critical issues - safety, quality, cost, and site closure.

Reviewed progress on issues and action plans each week.

Audited site closure versus plan; there were no significant variances.

Continued dismantling and salvage of shut-down equipment.

TABLE 2-1

Project Quality

Status as of  
04/30/96

Goals

Yes	1)	No OSHA recordable injuries.
Attention	2)	100% compliance with all safety rules and procedures.
Yes	3)	No citations for violations of applicable, relevant and appropriate regulations.
Yes	4)	100% attendance (including contractors) at daily safety meetings.
Attention	5)	Less than 24-hour response time on health and safety issues.
Yes	6)	100% sign-in and security clearance.
Yes	7)	No invalidation of reported data due to QA/QC issues.
	8)	Spend less than:
		<u>MH/Month</u>
Yes	•	Direct hire 400
Yes	•	FLTG management 200
Yes/Attention	•	Technical support 80
Yes/Attention	•	Maintenance support 60
Yes	9)	Hold analytical cost to less than \$12,000 per quarter (1996 only).
Yes	10)	No unscheduled overtime (per day or per week).
Yes	11)	No agency contacts which require 3rd party resolution.
Yes	12)	Documented training of site personnel for all work assignments.
Yes	13)	Monthly audit of actual performance versus goals and closure plan.

## 2.2 Problem Areas and Recommended Solutions

<u>Problem</u>	<u>Solution</u>
Maintain high level of safety awareness.	Daily raffle ticket program. Daily safety meetings. Safety meeting participation. Training. Regular HAZOP's. Regular on-the-job contacts. Constant hazard awareness.
On-the-Job safety attention.	Review job details as work proceeds. Stop and challenge approach. Constant emphasis and reminders. Frequent supervisory contact.
Hazard detection and response.	Safety inspections. HAZOP's on all jobs. Constant awareness and follow-up. Sensitive to changing conditions.

## 2.3 Problems Resolved

<u>Problem</u>	<u>Solution</u>
Cell D water management.	Backfill Cell D.
Water treatment plant status.	Sell the plant.
Chlorinated organic levels in INT-130.	Replace INT-130.

## 2.4 Deliverables Submitted

March, 1996 monthly report  
INT-130 replacement plan

## 2.5 Upcoming/Ongoing Events and Activities

Daily safety meetings and inspections.

Daily safety awareness program.

Emphasis on the safety aspect of multiple work assignments.

Emphasis on hazard identification and response.

Attention to safety details during dismantling and disposal.

Measure ambient air quality in all work areas several times per day.

Operate Data Base Management System.

Water trees as required.

Total Quality process.

Stabilize Cell D residue.

Backfill Cell D.

Implement site closure plan.

Final site grading and vegetation.

Implement long-term site management plan.

Dismantle and ship water treatment plant.

Dismantle and salvage remediation systems.

## **2.6 Key Staffing Changes**

None.

## 2.7 Percent Complete

Research & Development	-100%
Facilities	-100%
Slough	-100%
Subsoil Investigation	-100%
Floodwall	-100%
Lagoon Remediation	-100%
Groundwater	- 97%
Lagoon Dewatering/Fixation	- 98%
Water Treatment	-100%
Wetlands	- 98%
Demobilization	- 95%
Monitoring	- 77%

## 2.8 Schedule

All deliverables are on schedule.

Complete site closure by July 1, 1996.

## 2.9 Operations and Monitoring Data

The monitoring data, generated during April, 1996, are submitted as parts of this report, and the supporting data are stored in secure storage at the French project office.

## 2.10 Credits Accrued/Applied

### Status of Credits

	Accrued this period	Accrued to date	Applied this period	Applied to date	Running total
December 1990	34	34	0	0	34
December 1991	0	100	0	0	100
December 1992	0	101	0	2	99
December 1993	0	104	0	4	100
December 1994	0	109	0	4	105
January 1995	0	109	0	4	105
February 1995	0	109	0	4	105
March 1995	0	109	0	4	105
April 1995	0	109	0	4	105
May 1995	0	109	0	4	105
June 1995	0	109	0	4	105
July 1995	0	109	0	4	105
August 1995	2	111	0	4	107
September 1995	1	112	0	4	108
October 1995	0	112	0	4	108
November 1995	0	112	0	4	108
December 1995	0	112	0	4	108
January 1996	0	112	0	4	108
February 1996	0	112	0	4	108
March 1996	0	112	1	5	107
April 1996	0	112	0	5	107

## 2.11 Community Relations

Maintained 24-hour, call-in Hot Line.

Supported Barrett Youth Program.

### **3.0 GROUNDWATER AND SUBSOIL REMEDIATION**

#### **3.1 Summary of Activities**

Progress and response are consistent with plan.

No problems or issues requiring response action.

#### **3.2 Pending Issues**

Intrinsic bioremediation progress.

Replace INT-130.

Quarterly monitoring results.

#### **3.3 Operational Refinements**

None.

#### **3.4 Data Summary and Discussion**

No new data collected.

#### **3.5 Schedule**

Quarterly natural attenuation progress report in May, 1996.



## 4.0 SITE CLOSURE AND DISMANTLING

### 4.1 Summary of Activities

Completed dismantling of office building.

Completed dismantling of support facilities.

Audited closure activities and progress versus the plan; there were no major variances.

Awarded contract for water treatment plant purchase.

### 4.2 Problems and Response Actions

None.

### 4.3 Problems Resolved

<u>Problem</u>	<u>Solution</u>
Tripping hazards.	Continuously inspect and pick up work areas.
Coordinate electrical dismantling.	W&W Electrical to isolate power to all but security office.

### 4.4 On-going Activities

Dismantle and dispose/save all piping and conduit.

Daily safety meetings and constant safety awareness.

Include all contractors on daily safety incentive.

Dismantle water treatment plant.

Dismantle heavy concrete and dispose off-site.

## 5.0 AMBIENT AIR MANAGEMENT

Ambient air quality management continued on an "as-needed" basis to protect the environment, human health, and site workers.

### 5.1 Summary of Activities

Collected and analyzed three ambient air samples; sent April samples to Keystone; the results indicated no excess exposure to organic chemicals.

Sampled the ambient air in all work areas several times per shift and on a random "spot-check" basis; there were no levels of volatile organic compounds which required response action. Sampled ambient air in special work areas where burning and/or welding was planned. Sampled ambient air continuously in areas where exposure could occur and where confined space work occurred.

### 5.2 Problems and Response Action

<u>Problem</u>	<u>Response Action</u>
Calibrate portable vapor meters.	Calibrate before each use.
Sampling "hot" wells.	Require respirator use when sampling "hot" wells.
Ambient air quality in all work areas.	Check all work areas with portable meter several times per day.

### 5.3 Problems Resolved

None.

### 5.4 On-going Events/Activities

Measure ambient air quality in all work areas several times per day.

Require respiratory protection when sampling "hot" wells.

Conduct necessary air sampling and analyses to issue and maintain "burn" permits.

Conduct the necessary air sampling to issue and maintain confined space entry permits.

Closely monitor ambient air quality in the vicinity of all dismantling work.

## **6.0 QUALITY ASSURANCE/QUALITY CONTROL**

### **6.1 Summary of Activities**

Field parameters on all samples met QAQC requirements.

The air sample results were validated with no unresolved issues.

### **6.2 Problems and Response Action**

None.

### **6.3 Problems Resolved**

None.

### **6.4 Upcoming Events and Activities**

Quarterly aquifer remediation progress sampling.

QAQC validation of all groundwater samples.

Audit closure activities/progress versus plan every two weeks.

Issue 2nd Quarter, 1996, Aquifer Progress Sampling Report.

## **7.0 SITE MAINTENANCE**

### **7.1 Summary of Activities**

The site safety and housekeeping inspections and responses kept grounds safe and attractive for employees and visitors.

All purchases were covered by written requisitions and purchase orders

Smith Security provides security at the FLTG site, including the south side of Gulf Pump Road; all site areas are checked. No incidents reported by Security in April.

Data is entered on a daily basis.

On-site personnel requirements decreased as the dismantling proceeded.

Finalized long-term site management plan for FLTG.

### **7.2 Problem Areas and Response Action**

None.

### **7.3 Problems Resolved**

None.

**7.4 Upcoming Events and Activities**

Control purchasing and contracting.

Process invoices and cash management.

Evaluate long-term property access options.

Dismantle water treatment plant.

Sell surplus equipment.

Inventory repositories.

## **8.0 WETLANDS MAINTENANCE**

### **8.1 Summary of Activities and Progress**

Inspected the site twice per week to evaluate status and to determine maintenance requirements.

Completed work on a video of the project.

Completed 2nd quarter status audit.

Continued the 5-year maintenance program.

### **8.2 Problem Areas and Solutions**

None.

### **8.3 Problems Resolved**

None.

### **8.4 Deliverables Submitted**

March, 1996, Monthly Report.

### **8.5 Upcoming Events and Activities**

Daily safety program when work on site.

Support Baytown response plan for the remaining affected soil.

Support Baytown plans to expand nature center.

Regular site inspections.

Site maintenance as required.

Quarterly status report in May, 1996.